

1 Timothy M. Frank (California Bar No. 263245)

timothy.frank@hnbllc.com

2 Joseph H. Boyle (*pro hac vice*)

3 joe.boyle@hnbllc.com

Stephen M. Ferguson (*pro hac vice*)

4 stephen.ferguson@hnbllc.com

5 HAGAN NOLL & BOYLE LLC

820 Gessner, Suite 940

6 Houston, Texas 77024

7 Telephone: (713) 343-0478

Facsimile: (713) 758-0146

8 David A. Van Riper (California Bar No. 128059)

9 dave@vanriperlaw.com

10 VAN RIPER LAW

1254 Irvine Blvd., Suite 200

11 Tustin, California 92780-3571

12 Telephone: (714) 731-1800

13 Facsimile: (714) 731-1811

14 Attorneys for Plaintiff DISH Network L.L.C.

15
16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**
18 **WESTERN DIVISION**

19 DISH NETWORK L.L.C.,

20 Plaintiff,

21 v.

22 JADOO TV, INC. et al.,

23 Defendants.

Case No. 2:18-cv-9768-FMO (KSx)

**DISH NETWORK L.L.C.'S NOTICE
OF MOTION FOR AWARD OF
EXPENSES INCURRED IN
BRINGING MOTION TO COMPEL
SAJID SOHAIL'S PRODUCTION OF
DOCUMENTS (DKT. 75)**

Date: October 2, 2019

Time: 11:00 a.m.

Ctrlm: 580

Judge: Hon. Karen L. Stevenson

1 TO DEFENDANTS AND THEIR ATTORNEY'S OF RECORD:

2 PLEASE TAKE NOTICE that on October 2, 2019 at 11:00 AM or as soon
3 thereafter as the matter may be heard, before the Honorable Karen L. Stevenson of
4 the United States District Court for the Central District of California, Roybal Federal
5 Building and Courthouse, 255 E. Temple St., Courtroom 580, Los Angeles, CA
6 90012, Plaintiff DISH Network L.L.C. ("DISH") will, and hereby does, move this
7 Court pursuant to Federal Rule of Civil Procedure 37(a)(5)(A) and the Court's Order
8 of August 14, 2019 (Dkt. 96), for an award of expenses incurred in bringing its motion
9 to compel Sajid Sohail's production of documents (Dkt. 75). DISH requests an award
10 of \$20,645.55 (44.9%) in attorney's fees and \$1,819.87 in costs.

11 This motion is based upon this Notice of Motion, the Memorandum of Points
12 and Authorities in Support of the Motion, the Declaration of Stephen M. Ferguson
13 and all pleadings and records on file in this action and any other arguments and
14 evidence presented to this Court at or before the hearing on this motion.

15 Pursuant to Civil Local Rule 7-3, DISH met and conferred with counsel for
16 Defendant Sajid Sohail, on the matters in this motion on August 16, 2019, and
17 Defendant opposes this motion.

18 Dated: August 21, 2019 Respectfully submitted,

19 By: /s/ Stephen M. Ferguson

20 Stephen M. Ferguson (*pro hac vice*)

21 stephen.ferguson@hnbllc.com

22 Timothy M. Frank (California Bar No. 263245)

23 timothy.frank@hnbllc.com

24 Joseph H. Boyle (*pro hac vice*)

25 joe.boyle@hnbllc.com

26 HAGAN NOLL & BOYLE LLC

27 820 Gessner, Suite 940

28 Houston, Texas 77024

Telephone: (713) 343-0478

Facsimile: (713) 758-0146

David A. Van Riper (California Bar No. 128059)
dave@vanriperlaw.com
VAN RIPER LAW
1254 Irvine Blvd., Suite 200
Tustin, California 92780-3571
Telephone: (714) 731-1800
Facsimile: (714) 731-1811

Attorneys for Plaintiffs DISH Network L.L.C.